

Objection Date: March 26, 2012  
Hearing Date: TBD

WACHTELL, LIPTON, ROSEN & KATZ  
51 West 52nd Street  
New York, NY 10019-6150  
Telephone: (212) 403-1000  
Facsimile: (212) 403-2000  
*Attorneys for JPMorgan Chase Bank, N.A.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re	)	
	)	Chapter 11
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	)	Case No. 08-13555 (JMP)
	)	(Jointly Administered)
Debtors.	)	
	)	
In re	)	
	)	
LEHMAN BROTHERS INC.,	)	Case No. 08-01420 (JMP) SIPA
	)	
Debtor.	)	
	)	

**NOTICE OF MOTION TO STRIKE**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, the Declaration of Emil A. Kleinhaus and the exhibits thereto, and all proceedings heretofore had before this Court, claimant JPMorgan Chase Bank, N.A., by its undersigned counsel, hereby moves before the Honorable James M. Peck of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, for an order striking the portions of the *Objection to Portions of Proofs of Claim No. 66462 Against Lehman Brothers Holdings Inc. and No. 4939 Against Lehman Brothers Inc. of JPMorgan Chase Bank, N.A. Regarding Triparty Repo-Related Losses*, Docket Number 19604, that concern the Decem-

ber 2008 settlement agreement between JPMorgan, Barclays Capital Inc., and the Trustee for Lehman Brothers Inc. (Objection ¶¶ 71-82), and JPMorgan's entitlement to postpetition interest (*id.* ¶¶ 83-89), under Federal Rule of Civil Procedure 12(f), as incorporated in Bankruptcy Rule 7012(b), which this Court may apply here under Bankruptcy Rule 9014(c).

Dated: February 24, 2012  
New York, New York

Respectfully submitted,

*Of counsel:*

WACHTELL, LIPTON, ROSEN & KATZ

Douglas K. Mayer  
Ian Boczek  
Emil A. Kleinhaus

By: /s/ Harold S. Novikoff  
Harold S. Novikoff

51 West 52nd Street  
New York, NY 10019  
Telephone: (212) 403-1000  
Facsimile: (212) 403-2000

*Attorneys for JPMorgan Chase Bank, N.A.*